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6 *Attorneys for Defendant*
7 *Bunga Bunga LLC*

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 LUIS PONCE, an individual, and ON
12 BEHALF OF OTHERS SIMILARLY
SITUATED,

13 Plaintiffs,

14 vs.

15 BUNGA BUNGA LLC, a domestic limited-
16 liability company,

17 Defendant.

Case No. 2:19-cv-02002-KJD-VCF

STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFFS'
COMPLAINT

(FIRST REQUEST)

18 IT IS HEREBY STIPULATED by and between Plaintiff Luis Ponce ("Plaintiff"),
19 through his counsel Lagomarsino Law, and Defendant Bunga Bunga LLC ("Defendant"),
20 through its counsel Jackson Lewis P.C., that Defendant shall have up to and including Monday,
21 January 13, 2020, in which to file a response to Plaintiff's Complaint. This Stipulation is
22 submitted and based upon the following:

- 23 1. Defendant's response to the Complaint is currently due on December 12, 2019.
- 24 2. Due to the class and collective claims alleged in the Complaint and defense
25 counsel's recent retention, Defendant requires additional time to investigate Plaintiff's
26 allegations before responding to the Complaint.
- 27 3. This is the first request for an extension of time for Defendant to file a response to
28 Plaintiff's Complaint.

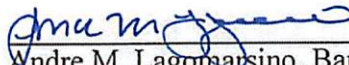
1 4. Plaintiff has expressed an intent to file an amended complaint. Should Plaintiff
2 amend his complaint, Defendant's time to respond shall be governed by the Federal Rules of
3 Civil Procedure and calculated based on the date of service of the amended complaint, unless
4 the parties submit a further stipulation extending this deadline.

5 5. This request is made in good faith and not for the purpose of delay.

6 6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
7 as waiving any claim and/or defense held by any party.

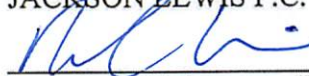
8 Dated this 9th day of December, 2019.

9 LAGOMARSINO LAW

10 
11 Andre M. Lagomarsino, Bar No. 6711
12 3005 W. Horizon Ridge Pkwy., Suite 241
Henderson, Nevada 89052

13 *Attorney for Plaintiff*

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Attorneys for Defendant

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15
16 **ORDER**

17 IT IS SO ORDERED:

18 
19 United States ~~District Court~~/Magistrate Judge

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21 Dated: 12-10-2019
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